

*Williams v. Tessman, et al.*

Case No.: 23-CV-5945

File No.: 23-4230

## **EXHIBIT 3**

**From:** [Laura M. Ranum](#)  
**To:** [John Marrese](#); [lynette\\_santiago@ilnd.uscourts.gov](mailto:lynette_santiago@ilnd.uscourts.gov)  
**Cc:** [Brian Eldridge](#); [Steven Hart](#); [Carter Grant](#); [Morgan Forbes](#); [Bhavani Raveendran](#); [sharton@rblaw.net](mailto:sharton@rblaw.net); [pdriscoll](#); [Dana Kondos](#); [mkujawa@schainbanks.com](mailto:mkujawa@schainbanks.com); [dostvig@schainbanks.com](mailto:dostvig@schainbanks.com); [stephanie.weiner@heplerbroom.com](mailto:stephanie.weiner@heplerbroom.com); [Joseph A. Fay](#); [tekl@eklwilliams.com](mailto:tekl@eklwilliams.com); [tstanker@eklwilliams.com](mailto:tstanker@eklwilliams.com); [Eileen E. Rosen](#); [agrill@rfclaw.com](mailto:agrill@rfclaw.com); [Brittany D. Johnson](#); [Rebecca Laue](#); [JESSICA WASSERMAN](#); [DiCianni, Thomas](#); [Paige Smith](#); [Alexis M. Gamboa](#)  
**Subject:** RE: Emergency Motion Request – 1:23-cv-5945 (Williams v. Tessmann, et al.) - Motion to Amend Complaint to Avoid Any Statute of Limitations Defense  
**Date:** Wednesday, September 4, 2024 11:01:00 AM

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Ms. Santiago:

On behalf of both the Lake County and Vernon Hills Defendants, we do object on at least one basis which impacts all defendants—namely—that upon information and belief, Ms. Huller is employed by Plaintiff’s law firm.

As a result, we respectfully request a briefing schedule.

Thank you,

**Laura M. Ranum**

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**From:** John Marrese <[jmarrese@hmelegal.com](mailto:jmarrese@hmelegal.com)>  
**Sent:** Wednesday, September 4, 2024 10:24 AM  
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**Subject:** Emergency Motion Request – 1:23-cv-5945 (Williams v. Tessmann, et al.) - Motion to Amend Complaint to Avoid Any Statute of Limitations Defense

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Dear Ms. Santiago,

I am communicating regarding an Emergency Motion that Plaintiff wishes file to be heard as soon as possible, but no later than this Friday, September 6, 2024. A copy of the proposed emergency motion and its exhibit (proposed amended complaint) are attached.

**Nature of Emergency:** In this wrongful conviction civil rights lawsuit, this Friday, September 6, 2024, marks two years from the date of Plaintiff's release from prison. Plaintiff is seeking to amend the complaint to rename two Estate Defendants (already named) to avoid any **potential statute of limitations** arguments from these two Defendants should the amendment be filed after the two-year period (i.e., after September 6, 2024).

**Motion Summary:** Plaintiff re-opened the estates of two deceased defendants (Jones Estate and Garofalo Estate) and had new administrators appointed. The appointments did not occur until August 29 and September 3, 2024, respectively. Plaintiff seeks to amend the complaint to identify these new administrators in place of those old administrators named in the complaint.

**Status of Defendants' positions on amendment.** Plaintiff's counsel emailed defense counsel as to this proposed Amendment at 11am yesterday (9/3). As to the Nancy Jones Estate, all Defendants consent except that I have not received a decision yet from counsel for Lake County Defendants. As to the Garofalo Estate, counsel for the current Garofalo Estate Defendant objects, Lake County Defendants have not responded, and all other Defendants consent.

All counsel for Defendants (and Plaintiffs) are copied here.

Sincerely,

John Marrese

*One of the Attorneys for Plaintiff*



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